

REMARKS

The Official Action mailed August 5, 2008, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on December 27, 2004; July 15, 2005; August 26, 2005; November 22, 2005; and April 9, 2007.

Claims 1-35 and 38-59 were pending in the present application prior to the above amendment. Claims 3-8, 11, 12, 15, 16, 19, 20, 27, 28, 38-41, 46, 47, 50-55, 57 and 59 have been canceled without prejudice or disclaimer; and claims 1, 2, 13, 14, 21-26, 29, 30, 34, 35, 44, 45, 48 and 49 have been amended to better recite the features of the present invention. Accordingly, claims 1, 2, 9, 10, 13, 14, 17, 18, 21-26, 29-35, 42-45, 48, 49, 56 and 58 are now pending in the present application, of which claims 1, 2, 21 and 22 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 5 of the Official Action rejects claims 1-8, 13-22, 31-35, 38, 40-43, 51, 52 and 56-59 as obvious based on the combination of U.S. Patent No. 5,902,688 to Antoniadis; U.S. Patent No. 6,101,316 to Nagashima; U.S. Patent No. 5,294,870 to Tang; U.S. Patent No. 6,049,167 to Onitsuka; Burrows, "Organic vapor phase deposition: a new method for the growth of organic thin films with large optical nonlinearities," Journal of Crystal Growth, Vol. 156, 1995, pages 91-98; U.S. Patent No. 5,225,238 to Ardaillon, U.S. Patent No. 5,534,314 to Wadley; and U.S. Patent No. 6,537,607 to Swanson. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some reason, either

in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some reason to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. Independent claims 1, 2, 21 and 22 have been amended to recite forming a first thin film transistor for switching a first pixel and a second thin film transistor for switching a second pixel adjacent to the first pixel over a substrate; forming a first pixel electrode electrically connected to the first thin film transistor and a second pixel electrode electrically connected to the second thin film transistor; forming a bank between the first pixel electrode and the second pixel electrode; evaporating the first and the second organic electroluminescence materials in an inert gas atmosphere at an atmospheric pressure by heating the first and the second evaporation cells which are controlled by a heating means so that a first light emitting layer pattern comprising the first organic electroluminescence material is formed over the first pixel electrode without using a mask (by opening and closing the shutter) and a second light emitting layer pattern comprising the second organic electroluminescence material is formed over the second pixel electrode without using a mask (by opening and closing the shutter); wherein the first light emitting layer pattern is electrically

connected to the first pixel electrode and the second light emitting layer pattern is electrically connected to the second pixel electrode; and wherein each of the first and the second evaporation cells comprises a first portion and a second portion having an inner diameter smaller than that of the first portion. These features are supported in the present specification, for example, by Figures 1, 2, 5, 6A and 6B. Also, claims 2 and 22 further recite wherein the heating means is placed outside the reaction chamber, which is supported in the present specification, for example, by Figure 1. The Applicant respectfully submits that Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley and Swanson, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.

Since Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley and Swanson do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Paragraphs 6-17 of the Official Action reject independent claims 21 and 22 and dependent claims 9-12, 23-30, 39, 40 and 42-55 as obvious based on the combination of Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley, and Swanson and one or more of the following: U.S. Patent No. 5,945,967 to Rallison, U.S. Patent No. 6,495,198 to Peng, U.S. Patent No. 5,921,836 to Nanto, U.S. Patent No. 4,672,265 to Eguchi, and U.S. Patent No. 6,294,892 to Utsugi. Please incorporate the arguments above with respect to the deficiencies in Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley and Swanson. Rallison, Peng, Nanto, Eguchi and Utsugi does not cure the deficiencies in Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley and Swanson. The Official Action relies on Rallison to allegedly teach "that electroluminescent displays are suitable for forming video camera displays" (page 10, Paper No. 20080724), on Peng to allegedly teach "moving the substrate and organic electroluminescent sources relative to one another in order to form blurred junctions and thereby improve the conductivity between layers" (page 11, Id.), on Nanto

to allegedly teach "that phosphor stripes may be applied to display panels by moving the deposition sources" (page 12, Id.), on Eguchi to allegedly teach "that tungsten is an operative material for evaporation boats for electroluminescent materials" (page 13, Id.) and on Utsugi to allegedly teach "that pixel dimensions are suitable for organic EL displays" (page 14, Id.). However, Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley, Swanson, Rallison, Peng, Nanto, Eguchi and Utsugi, either alone or in combination, do not teach or suggest that Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley and Swanson should be modified to include the features of the amended independent claims.

Also, dependent claims 44, 45, 48 and 49 recite that each of the first and the second light emitting layer patterns has a width of about 50 to 200 μ m. The Official Action asserts that "it is well known in the art of organic electroluminescent devices to use pixels, which have widths in the claimed range" (Id., citing column 8, lines 42-52; and column 9, lines 62-65, of Utsugi). The Applicant respectfully disagrees and traverses the assertions in the Official Action. Utsugi appears to teach using a pattern mask to form a luminescent portion. Utsugi does not teach or suggest forming a light emitting layer pattern without using a mask. The Official Action does not demonstrate why one of ordinary skill in the art at the time of the present invention would have had sufficient reason to apply the features of Utsugi's process, which requires a mask, to a process of forming a light emitting layer pattern without using a mask. Therefore, Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley, Swanson and Utsugi do not teach or suggest that each of first and the second light emitting layer patterns has a width of about 50 to 200 μ m.

Since Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley, Swanson, Rallison, Peng, Nanto, Eguchi and Utsugi do not teach or suggest all the claim limitations and since there is insufficient reason to combine Antoniadis, Nagashima, Tang, Onitsuka, Burrows, Ardaillon, Wadley, Swanson and Utsugi, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and

withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,


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